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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE ABRAMOV,

Defendant.

2:21-CR-027-RFB-DJA

**United States of America's Unopposed
Motion to Approve Sale Price and Sale
Terms for Real Property Located at 3726
South Las Vegas Boulevard, Unit 509, Las
Vegas, Clark County, Nevada, and Order**

The United States moves this Court to approve the sale of 3726 South Las Vegas Boulevard, Unit 509, Las Vegas, Clark County, Nevada (property)¹ for \$325,000.

¹ MORE PARTICULARLY DESCRIBED AS:

PARCEL 1:

UNIT 509 IN BUILDING WEST IN VEER TOWERS, AS SHOWN ON THAT CERTAIN FINAL MAP OF THE VEER TOWERS, A RESORT CONDOMINIUM SUBDIVISION ON FILE IN BOOK 142 OF PLATS, PAGE 42 AND AS SET FORTH IN THE DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS AND RESERVATION OF EASEMENTS FOR VEER TOWERS RECORDED MAY 03, 2010 IN BOOK 20100503 AS INSTRUMENT NO. 0002036, BOTH IN THE OFFICE OF THE COUNTY RECORDER, CLARK COUNTY, NEVADA.

PARCEL 2:

AN ALLOCATED INTEREST AS A TENANT-IN-COMMON IN THE COMMON ELEMENTS OF VEER TOWERS (INCLUDING ANY ANNEXATIONS THERETO), AS SHOWN BY THE MAP AND AS SET FORTH IN THE DECLARATION.

PARCEL 3:

AN EXCLUSIVE EASEMENT APPURTENANT TO PARCELS 1 AND 2 DESCRIBED ABOVE, OVER AREAS DEFINED AND DESCRIBED AS LIMITED COMMON ELEMENTS, IF ANY, ALLOCATED TO PARCELS 1 AND 2 IN THE DECLARATION AND AS SHOWN AND DELINEATED UPON THE MAP REFERRED TO ABOVE.

PARCEL 4:

NON-EXCLUSIVE EASEMENTS FOR ACCESS, INGRESS, EGRESS, USE AND OTHER PURPOSES ALL DESCRIBED IN THE DECLARATION AND IN THAT CERTAIN (A) DECLARATION OF CENTRAL PLANT EASEMENTS, DATED

1 The reasons for this request are (1) to authorize Doug Sawyer to sell the property for
 2 \$325,000 under the Court-ordered interlocutory sale and (2) to stop the continued increase
 3 of (a) the Clark County real property taxes, interest, and penalties and (b) HOA fees,
 4 interest, and penalties.

5 This Motion is made and is based on the papers and pleadings on file herein and the
 6 attached Memorandum of Points and Authorities.

7 **Motion and Memorandum of Points and Authorities**

8 This Court authorized the Interlocutory Sale of the property.² Mr. Sawyer listed the
 9 price for \$325,000. Kristen Paige Keel offered \$325,000 to purchase the property. If this
 10 Court does not approve the sale, Ms. Keel will receive her earnest money deposit. Mr.
 11 Sawyer received other offers, but they failed to come to fruition.

12 If this Court approves this offer and after the unpaid real estate taxes; the unpaid
 13 HOA fees; the broker commission and expenses; and escrow costs and fees, the remaining
 14 net sale proceeds will be payable to the United States Marshal Service deposited into an
 15 interest-bearing account. The net sale proceeds will constitute the amount to be retained by
 16 the Court as a substitute res under Supp. R. G(7)(b)(iii) and (iv).

17 _____
 18 DECEMBER 01, 2009 AND RECORDED DECEMBER 01, 2009 IN BOOK 20091201
 19 AS INSTRUMENT NO. 0002884 OF OFFICIAL RECORDS, AND AS AMENDED BY
 20 THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF CENTRAL PLANT
 21 EASEMENTS, DATED JANUARY 07, 2010 AND RECORDED JANUARY 07, 2010
 22 IN BOOK 20100107 AS INSTRUMENT NO. 0000577 OF OFFICIAL RECORDS; (B)
 23 PARKING AND ACCESS AGREEMENT, DATED APRIL 28, 2010 AND
 24 RECORDED MAY 03, 2010 IN BOOK 20100503 AS INSTRUMENT NO. 0000515 OF
 25 OFFICIAL RECORDS; (C) DECLARATION OF SUPPORT AND ENCROACHMENT
 26 EASEMENTS, DATED DECEMBER 01, 2009 AND RECORDED DECEMBER 01,
 27 2009 IN BOOK 20091201 AS INSTRUMENT NO. 0002885 OF OFFICIAL RECORDS,
 28 AND AS AMENDED BY THAT CERTAIN FIRST AMENDMENT TO
 DECLARATION OF SUPPORT AND ENCROACHMENT EASEMENTS, DATED
 JANUARY 07, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS
 INSTRUMENT NO. 0000578 OF OFFICIAL RECORDS; AND (D) DECLARATION
 OF LIFE SAFETY SYSTEMS EASEMENTS, DATED DECEMBER 01, 2009 AND
 RECORDED DECEMBER 01, 2009 IN BOOK 20091201 AS INSTRUMENT NO.
 0002886 OF OFFICIAL RECORDS, AND AS AMENDED BY THAT CERTAIN FIRST
 AMENDMENT TO DECLARATION OF LIFE SAFETY SYSTEM EASEMENTS
 DATED JANUARY 07, 2010 AND RECORDED JANUARY 07, 2010 IN BOOK
 20100107 AS INSTRUMENT NO. 0000579 OF OFFICIAL RECORDS, AND ALL
 IMPROVEMENTS AND APPURTENANCES THEREON, APN: 162-20-714-020.

² Order, ECF No. 56, granting Motion for an Interlocutory Order of Sale of 3726 South Las Vegas Boulevard, Unit 509, ECF No. 54.

1 The government has determined that (1) neither the buyer nor any individual who
2 will be on the title after the completion of the sale is a felon; and (2) this sale represents an
3 arms-length transaction under the law.


4 On October 5, 2022, Jorge Abramovs, through his counsel, Margaret W. Lambrose,
5 agreed to the sale price of \$325,000.

6 Dated: October 5, 2022.

7 JASON M. FRIERSON
United States Attorney

8 /s/ Daniel D. Hollingsworth
9 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

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12 IT IS SO ORDERED:

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15 RICHARD F. BOULWARE
UNITED STATES DISTRICT JUDGE

16 DATED: October 7, 2022
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